Management System: Quality Assurance and Oversight

Subject Area: Quality Oversight and Assessments

# **Procedure: Assessment/Management Assessment and Oversight**

**Issue Date and Revision Number:**3-12-2015 2

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## 1.0 Applicability

This procedure applies to all Assessment/Management Assessments and Oversight activities performed by the Environmental Management Consolidated Business Center (EMCBC) and participating Small Sites. This procedure meets the requirements of EM-QA-001 *EM Quality Assurance Program (QAP)* and DOE Order 414.1D, *Quality Assurance* Criterion 10, Assessments/*Management Assessments*. Assessment/Management Assessments also use guidance provided in DOE G 414.1 1C, *Management Assessment and Independent Assessment Guide*. In addition, this procedure meets the requirements of DOE O 226.1B, *Implementation of Department of Energy Oversight Policy*. Federal Line Management Oversight (Operational Oversight) should use the guidance established in DOE G 226.1-2A, *Federal Line Management Oversight of Department of Energy Nuclear Facilities* and in *DOE-STD-1063-2011 Facility Representatives*.

#### **Assessment / Management Assessments Requirements**

Individuals or a group of Line Managers or personnel knowledgeable in the subject areas to be assessed may lead or assist in performing Assessment/Management Assessments. The primary responsibility of the personnel performing these activities is to evaluate contractor and DOE programs and management systems, including site assurance systems, for effectiveness of performance (including compliance with requirements) and to identify barriers or opportunities to improve performance. Assessments can be a review, an evaluation, an inspection, a test, a check, a surveillance, or self-assessment to determine and document whether items, processes, systems, or services meet specified requirements and perform effectively or could be modified to improve efficiency.

DOE G 414.1-1C, *Management and Independent Assessments Guide*, recommends that both management and independent assessments be performed by qualified individuals who are knowledgeable about the program, system, or process being assessed and have been trained to ensure full understanding of the assessment processes, including reporting. The EMCBC tailors this recommendation based on the size and complexity of the Assessment/Management

Assessment but at a minimum, individuals should be knowledgeable about the program, system, or process, which is being assessed.

#### **Oversight Requirements**

Line Management, Facility Representatives and personnel knowledgeable in the subject areas to be assessed perform Day to-Day Operational Awareness and Oversight activities. These personnel observe, evaluate, and report on the effectiveness of the operating contractor in multiple areas important to safe and, efficient operations, such as operational performance, quality assurance, management controls, emergency response readiness activities, and assurance of worker health and safety. Oversight programs include operational awareness activities, onsite reviews, assessments, self-assessments, performance evaluations, and other activities that involve evaluation of contractor organizations and Federal organizations that manage or operate DOE sites, facilities, or operations.

DOE O 226.1B requires that DOE organizations maintain sufficient technical capability and knowledge of site and contractor activities to make informed decisions about hazards, risks, and resource allocation; provide direction to contractors; and evaluate contractor performance.

Facility Representatives are trained in accordance with Core qualification requirements presented in DOE-STD-1146 and DOE-STD-1151 and site specific criteria established by Field Element Managers. Additional training and qualification requirements apply to defense nuclear facilities. These include the regulations set out in DOE O 426.1, Chg. 1, *Federal Technical Capability*, which applies only to Federal personnel. This directive provides specific requirements for qualification programs for Facility Representatives, Safety System Oversight (SSO) personnel, and senior technical safety managers (STSMs). DOE O 360.1C, *Federal Employee Training*, establishes requirements for the training of Federal personnel.

#### Assessment /Management Assessments and Oversight Formality and Scope

The level of formality and scope of Assessments/Management Assessments and Oversight can vary greatly. For example, as an informal assessment, a line manager, may evaluate the skills of personnel involved in the performance of a single work function and could document the need for additional training or staffing level adjustments through a simple memorandum. On the other hand, at the more formal extreme, an assessment team may be composed of senior line managers, Facility Representatives, personnel knowledgeable in the subject areas and process consultants from outside the organization. This Team could perform an extensive evaluation of an entire organization using checklists, interviews, document reviews, work observations, and evaluations by objective evidence, followed by the issuance of a formal report.

# 2.0 Required Procedure

ASSESSMENT/MANAGEMENT ASSESSMENT AND OVERSIGHT PLANNING			
Step 1	The EMCBC Director, Deputy Director, Assistant Directors, or Small Site Senior DOE Officials establish Assessment schedules but maintain flexibility in order to meet operational and management needs. These schedules provide the method for selecting the type, number, and frequency of routine operational awareness		

	activities and identify the personnel responsible for these assessments. Schedules are reviewed and updated on a regular basis to ensure relevance.		
	<b>Note:</b> Oversight activities do not typically involve formal schedules for day-to-day oversight. Oversight activities should vary day-to-day to show a degree of unpredictability and spontaneity based on judgment regarding what is appropriate to observe and assess.		
Step 2	The Assessment Lead reviews the scope of the oversight activity and reviews applicable requirements, and implementing documents.		
Step 3	The Assessment Lead selects an appropriate number of potential Assessment Team Members (if necessary) who collectively have experience or training commensurate with the scope, complexity, or special nature of the work requiring assessment or oversight.		
ASSESSME	NT AND OVERSIGHT PERFORMANCE		
Step 4	Line Managers, Facility Representatives, or personnel knowledgeable in the subject areas to be assessed evaluate the work activity against the requirements by using the guidance provided in DOE G 414.1 1C, <i>Management Assessment and Independent Assessment</i> and documents the activity on the Assessment/Management Assessment and Oversight Report Form:  Note:  Every worker has the right to stop work when they discover any exposure to imminently dangerous conditions or serious hazards. If an employee discovers such conditions, the employee should stop the work, notify the Senior Management, and then refer to the SAP-OTSAM-414C-05, Stop Work		
	Procedure.		
Step 5	Line Managers, Facility Representatives, and or personnel knowledgeable in the subject areas identify and document Issues on the Assessment/Management Assessment and Oversight Report Form:.		
	Identify issues that represent potential safety or quality concerns, process improvement opportunities, deviations from requirements, or any other issues worthy of management attention. Issues should be graded as Significant Deficiency, Deficiency, Observation or Comment as defined in the <i>Subject Area: SAD-OTSAM-414C, Quality Oversight and Assessment</i> . Significant Deficiencies and Deficiencies shall be entered into a formal corrective action system.		
ASSESSME	NT AND OVERSIGHT REPORTING ACTIVITIES (CONTRACTOR ACTIVITIES)		
Step 6	The Assessment Lead shall complete Assessment/Management Assessment and Oversight Report Form, FM-OTSAM-414C-F1. In addition, the Assessment Lead prepares Issues Transmittal Forms for all Significant Deficiencies, Deficiencies, and/or Observations and provides the form to the Responsible Manager for transmittal.		

Step 7	The Responsible Manager transmits the issues to the Contractor under cover letter and provides copy to the Contracting Officer and/or Contracting Officer Representative. The letter shall require Contractor Corrective Action Plans (CAPs) for each Significant Deficiency and Deficiency identified. DOE approval is required for all Significant Deficiencies identified.		
Step 8	CAPs shall be tracked to closure by the Contractor and verified closed by a designated representative of the DOE.		
ASSESSM	ENT AND OVERSIGHT REPORTING ACTIVITIES (DOE ACTIVITIES)		
Step 9	The Assessment Lead shall, complete and forward a copy of the Assessment/Management Assessment and Oversight Report Form to the Responsible Managers and provide a copy to the Corrective Action Coordinator identified in SAP-OTSAM-414B-01. If Significant Deficiencies and Deficiencies are discovered the Assessment Lead shall provide copies to the EMCBC Director Deputy Director and responsible Assistant Director. Corrective actions are required for each Significant Deficiency or Deficiency.		
Step 10	The Responsible Manager shall process Significant Deficiencies and Deficiencies using the SAP-OTSAM-414B-01, Corrective Action Procedure.		
POST ASS	SESSMENT ACTIVITIES		
Step 11	The Assessment Lead shall submit Lessons Learned (if any) to the EMCBC Lessons Learned Coordinator for distribution.		
Step 12	The Assessment Lead shall, provide the original signed copy of the Assessment/Management Assessment and Oversight Report Form to the EMCBC QA Records Custodian or Site Records Coordinator for processing in accordance with Section 4, Records Generation.  NOTE: If Oversight Reports are maintained electronically, Facility Representative or Subject Matter Experts (SMEs) shall work with the EMCBC or Small Site Records Management Field Officer (RMFO) to ensure they are managed appropriately.		

#### 3.0 References – Forms/Attachments/Exhibits

- FM-OTSAM-414C-01-F1, Assessment/Management Assessment and Oversight Report Form
- FM-OTSAM-414C-01-F2, Issue Transmittal Form

#### **4.0 Records Generation**

Records generated through implementation of this procedure are identified as follows and are maintained by the Office of Technical Support & Asset Management, and the Office of Contracting in accordance with the EMCBC organizational file plan. Small sites shall maintain

records under the same Records Category Code which is the equivalent to the DOE records disposition authority and are managed in accordance with their site file plan.

# RECORDS TABLE

Records Category Code	Records Title	Responsible Organization	QA Classification (Lifetime or Non- Permanent)
ENV 01-E-06	Assessment/Management Assessment and Oversight Report Form:	Office of Technical Support and Asset Management or applicable Field Office	N/A
ENV 01-B-04-B	Issue Transmittal Form	Office of Technical Support and Asset Management or applicable Field Office	Non-Permanent – maintained as QA record for one year after fiscal year the Corrective Actions are closed.
ENV 01-B-04-B	Assessment/Management Assessment and Oversight Report Form:	Office of Technical Support and Asset Management or applicable Field Office	Non-Permanent – maintained as QA record for one year after fiscal year the Assessment/ Management Assessment is closed.

#### EMCBC RECORD OF REVISION

### **DOCUMENT TITLE:** Assessment/Management Assessment and Oversight

If there are changes to the controlled document before the two-year review cycle, the revision number stays the same; one of the following will indicate the change:

- l Placing a vertical black line in the left margin adjacent to sentence or paragraph that was revised; or
- l Placing the words GENERAL REVISION at the beginning of the text. This statement is used when entire sections of the document are revised.

If changes and updates occur at the two-year review cycle, the revision number increases by one.

Rev. No.	Description of Changes	Revision on Pages	Date
0	Initial Document		8-9-12
1	Update to include changes in title, correct raining requirements, remove the term SME, and other Administrative changes.	All	10-24-13
2	Moved Issues Grading from this procedure to Oversight and Assessment SAD.	All	3-12-15